

# TFG PRIVACY STATEMENT

### WE VALUE YOUR PRIVACY

The Foschini Group Limited (TFG) and its subsidiaries believe that your personal information is your most valuable asset and that it should be protected.

TFG is committed to protecting your privacy and ensuring that your personal information is collected and used properly, lawfully and transparently. This Privacy Statement outlines our practices when it comes to personal information and it forms part of the terms and conditions for our credit products, myTFGrewards, lay-bys, e-commerce, employment relationships and relationships with our customers and service providers.

### WHO ARE WE?

TFG refers to The Foschini Group Limited which is our holding company and it includes all its subsidiaries and retail brands in South Africa and the African countries in which we trade. For more information on our brands please visit <a href="https://www.mytfgworld.com">www.mytfgworld.com</a>.

TFG is a lifestyle retailer offering (amongst others) homeware, jewellery, accessories, clothing, footwear, mobile products/services, mobile content, publishing and insurance products. These products are lifestyle products/services, which are similar in nature between the respective brands; and may be offered to you from time to time interchangeably, if you have agreed to receive marketing communication from TFG.

When you shop at TFG – you are buying into a lifestyle which covers your home, fashion, connectivity, leisure and insurance needs.

### WHAT PERSONAL INFORMATION DO WE COLLECT?

The type of personal information that we collect, depends on the type of products or services that you choose to make use of, or select when you open an account, register for myTFGrewards program, shop or browse online on one of our websites or apps, enter one of our competitions or shop in our stores. Generally, we collect the following personal information:

 your name, surname, identity/passport number, contact information and residential/postal address;



- your age, gender, ethnicity (for statistical purposes), marital status and language preference;
- your employment information (including information on your CV if applicable), banking and financial information;
- any other form of personal information that we may reasonably require to offer any of our products or services to you;
- details of the resources that you access to visit our website (for example, URL addresses, traffic data etc.);
- information about the type of device you have used to visit our website, your device settings, and the cause of any system errors. Your device manufacturer or operating system provider will have further details on what information your device makes available;
- "cookies" that track your preferences during your visits to our websites which enables us to simplify navigation, by using Google Analytics (which is a web-analysis tool from Google Inc). This allows us to ensure that the content of our websites remain up to date and comprehensive. The information that is used during this process (which includes your IP Address) is de-identified and makes personal identification impossible. We own and retain all rights to de-identified statistical information collected and compiled by us. We also make use of first-party and third-party cookies, as well as web beacons and similar technologies to deliver measurement services and targeted advertising to our website visitors. Cookies may include Google Analytics cookies, a Google Ads cookie, and a Facebook Event Tracking cookie. Cookies help us to provide you with a better online experience, by enabling us to monitor which pages you find useful or not. A cookie does not give us access to your computer or any of your personal information, other than that which you choose to share with us. You may at any time decline cookies in your web browser settings, but this may prevent you from using the full functionality of our websites. For more information on the use of Google Analytics, please visit https://policies.google.com/technologies/partner-sites For detail regarding the information Google collects and how it is used to deliver targeted advertising, please visit http://www.google.com/policies/privacy/ads/

### **HOW WE COLLECT YOUR PERSONAL INFORMATION?**

We will collect personal information directly from you and, depending on the type of products/services used by you, it may be collected when you:

apply for a TFG Account with us and you complete the application form;



- sign up for myTFGrewards programme;
- create an online profile on our e-commerce platform or download one of our apps;
- visit our website, app or on our social media platform;
- purchase products on lay-by;
- shop with us as a customer; give us your details for an item request; engage with us online, telephonically, on social media, on our apps, by SMS, email or via WhatsApp;
- sign up for our newsletters;
- enter any of our competitions;
- are an employee or a prospective employee.

There are also instances where we will be using information from external sources, such as a registered credit bureau, when we need to obtain and verify your financial information in order to assess your application for credit and maintain your account. We will ensure that you are aware (through the relevant terms and conditions and this Privacy Statement) that we will be obtaining information from any source other than yourself.

### DO YOU HAVE TO SHARE YOUR PERSONAL INFORMATION WITH US?

In order for us to provide you with our products/services we may have to collect and process your personal information. This means that the processing of your personal information may be required and should you not wish for us to do so you will not be able to continue with purchasing our products/services.

### **HOW DO WE USE (PROCESS) YOUR INFORMATION?**

This will depend on the type of products/services that you are using but your personal information may be used for the following purposes:

- to assess your credit application when you open a TFG Account;
- to manage and administer your credit account, myTFGrewards programme, lay-by transactions, insurance policies, publication and mobile content product subscriptions, airtime/data contracts and your online shopping profile;
- to collect payment from you;
- to contact you to market our value added products and other offerings which you may be interested in, provided that you have agreed to receive such offers;
- to protect our legal rights and carry out any legal obligations;
- to improve personalised marketing offers to you by monitoring your buying patterns and using credit bureau data;



- to manage your employment relationship or potential employment relationship with us:
- to test changes to various IT systems, applications and for the purposes of training;
- to the extent necessary in terms of Occupational Health and Safety laws, in relation to your presence at a TFG premises.

There will also be instances where we are required by law or have another justification to process your information.

We have a legitimate interest to process your personal information in order for us to promote our business, brands and products and services:

- to contact you with information about our products and services after we presented you with an option to opt-in (e.g. using a tick box on the credit application);
- to deliver tailored advertising (including via social media);
- to personalise our marketing communications based on your attributes/profile;
- to administer and monitor our website and apps, including to ensure that content is presented in the most effective manner for you and for your device, and to allow you to participate in interactive features when you choose to.

### DO WE SHARE YOU PERSONAL INFORMATION?

We do not generally share your personal information with third parties but there are instances where we are required by law to do so; where we need to do so in order to provide you with our services and/or where you have consented to us sharing your personal information with third parties. Where we share your information with service provides we conclude agreements (where possible) to ensure that your personal information is only used for the purpose for which we collected it from you.

We will share your personal information:

- to transmit information regarding your credit application and account to a registered credit bureau, the South African Credit and Risk Reporting Association, and any other organisation representing credit bureaus;
- to manage and operate your account i.e. sending you communication;
- to instruct our debt collectors or attorneys in the event that your account is in arrears;
- to submit reports to any of our regulators, SARS or Ombuds;
- if you have consented to this to 3<sup>rd</sup> parties who will contact you about special offers;



- to maintain any special offers/products/subscriptions/services you have taken up with us, and/or to maintain your insurance cover (if applicable) with the relevant service provider;
- to provide information to our core service providers and third party platforms as required for our business to function; for example, picking, packaging and processing orders, fulfilling deliveries, customer support, fraud detection, credit risk reduction checks and IT systems support;
- with services such as those offered by Google, Facebook, Instagram and other similar social media platforms to better tailor our marketing communications and for targeted advertising. As part of this process, some personal information, such as your e-mail address, is provided to the relevant third party, however for security purposes this data is "hashed" prior to being shared. Hashing is a process of identity masking or "pseudonymisation" which means we do not disclose your e-mail address but this still enables linking between your social media presence and our records.

# HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

Protecting and securing your information is very important to us and we will take all reasonable and practicable steps to ensure that your personal information is secure. We stay up-to-date with industry best practice and the latest technologies. Should you have any questions regarding the safety of your personal information you are welcome to contact our Information Officer or the relevant Deputy Information Officer. Their details are contained in our PAIA manual (under Access to Information), which is available on our website: <a href="https://tfglimited.co.za/access-to-information">https://tfglimited.co.za/access-to-information</a>. HOW LONG WE KEEP YOUR PERSONAL INFORMATION?

We keep your personal information for as long as any contractual and legal requirements, credit risk, fraud detection and customer service periods require, as well as to comply with regulatory requirements, and the resolution of disputes or fraud prevention.

#### WILL WE SEND YOUR PERSONAL INFORMATION OUT OF THE COUNTRY?

TFG may process and store your personal information outside of South Africa. We may also receive and process personal information which is transferred from other TFG subsidiaries outside of South Africa.



TFG endeavours to transfer personal information to countries which offer the same level of protection as the Protection of Personal Information Act and/or the transfer is in terms of an agreement which provides an adequate level of protection.

### **MINORS**

If you are a minor (under the age of the 18 years), please ensure that you have your parent's/guardian's permission to operate any TFG website or application. Your parent/guardian must ensure that they consent on your behalf to the processing activities set out in this Statement.

### **YOUR CHOICES**

It is very important to us that you are aware of your rights when it comes to your personal information and we therefore need to inform you of the following options:

- you may enquire what personal information about you we hold and process;
- you may ask us to update, correct and/or delete your personal information;
- you may unsubscribe from any of our direct marketing communication;
- you may object to us processing your personal information.

To update, correct, to delete or de-identify your information (where possible), please contact Customer Services on the telephone number below. Please also refer to TFG's PAIA Manual for the process to request access to certain records which we my hold about you.

When you opt-in to TFG marketing, you are opted-in to all of our lifestyle brands and channels. When you opt-out of a particular channel, you are opted-out of that particular channel for that brand. In order to opt-out of all TFG marketing (for all brands and channels), please contact Customer Services on the number below. Note: it could take up to 48 hours for your updated election to take effect.

### TFG's contact information

Tel:	Head Office on +27 (0) 938 1911
	Customer Services on 0860 834 834
Email:	Proatia1@tfg.co.za



Address:	Stanley Lewis Building, 340 Voortrekker Road, Parow East, 7500
Website:	https://tfglimited.co.za/access-to-information to download our PAIA Manual

We ask you to inform us when your personal information changes so that we can keep your details up-to-date.

## The Information Regulator (South Africa)

If you are not happy with our response, or you feel aggrieved in any manner whatsoever, you may contact the Information Regulator on the numbers below.

Tel:	Head Office on +27 (0) 10 023 5200
	Cell on +27 (0) 82 746 4173
Email:	Complaints – complaints.IR@justice.gov.za
	General enquiries – <u>inforeg@justice.gov.za</u>
Address:	JD House, 27 Stiemens Street Braamfontein, 2001 (with effect from 1 April 2021) or P.O Box 31533, Braamfontein, Johannesburg, 2017

### AMENDMENTS TO THIS PRIVACY STATEMENT

We may amend this Privacy Statement at any time, but we will always ensure that the latest version is shown on our websites and apps.

# **CONTACT US**

If you have any questions about this Privacy Statement, please contact us on <a href="mailto:Proatia1@tfg.co.za">Proatia1@tfg.co.za</a>

11 June 2021